

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1, 17, 18 and 24 have been amended. Support for the amendments can be found throughout the specification and especially at page No new matter has been added. Claims 1-13, 16-18 and 22-24 are pending.

Claims 1, 5, 7, 8, 10-13, 17, 18, and 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell et al (WO 94/06086) in view of Lakritz (U.S. Pat No. 6,623,529). This rejection is respectfully traversed.

The Office Action asserts that Lakritz “teaches at col. 7, lines 40-45, ... text segments are marked as either translatable or non-translatable” and concludes that Lakritz teaches identifying an element as a source placeable element by predetermined criteria based on the content of the element. However, contrary to the Office Action’s assertion, Lakritz fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the content of the element. Rather, Lakritz discloses identifying text by the presence of HTML tags. Lakritz discloses, e.g., “[T]he string “here is some text” is marked as translatable by the parser” in reference to Here is some text (col. 7, lines 35-37). Lakritz also discloses, “[T]here are cases where text between tags is not necessarily translatable.” Col. 7, lines 49-50. Hence, Lakritz discloses identifying translatable and non-translatable text through the presence of “tags” (i.e., HTML tags).

While Carbonell identifies text using SGML tags, Lakritz identifies text using HTML tags. Both Carbonell and Lakritz require the presence of tags (either SGML or HTML tags) to identify text. Neither Carbonell nor Lakritz, either alone or in combination teaches or suggests identifying source placeable elements by predetermined criteria based on the content of the element. Therefore, the rejection should be withdrawn.

In addition, claim 1, as amended, recites designating the identified source placeable element by type. Both Carbonell and Lakritz fail to teach or suggest designating source placeable elements by type. Claim 1, as amended, recites identifying stored information that is substantially similar to the input source information. Both Carbonell and Lakritz fail to teach or suggest identifying stored information that is substantially similar to the input source information. Claim 1, as amended, recites comparing the type of the identified source placeable element to a type of a corresponding portion of the identified stored information for identifying a match of type of elements. Both Carbonell and Lakritz fail to provide this teaching or suggestion, either alone or in combination. Claim 1, as amended, recites replacing the portion of the identified stored information in a corresponding location in the identified stored information with the converted target placeable element if the match of type of elements is identified. Both Carbonell and Lakritz fail to provide this teaching or suggestion, either alone or in combination.

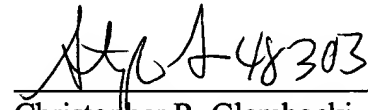
Claims 17, 18 and 24, as amended, are similar to claim 1 and are allowable for at least the reasons set forth above for claim 1.

Claims 2-13, 16, 22, and 23 depend from claims 1, 17, 18 or 24 and are allowable for at least the reasons set forth above.

In view of the above, it is respectfully submitted that the application is in condition for allowance. Reconsideration and prompt allowance are respectfully requested. If the Examiner feels that a telephone interview would be helpful in facilitating prosecution of the case, the Examiner is respectfully requested to contact the undersigned attorney of record to discuss the application.

Respectfully submitted,

By:



Christopher R. Glembocki
Registration No. 38,800

BANNER & WITCOFF, LTD.
1001 G Street, N.W., 11th Floor
Washington, D.C. 20001
(202) 824-3000

Dated: March 18, 2005